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Attorneys for Plaintiffs  
TRAVELERS PROPERTY CAS. CO., ET AL.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

TRAVELERS PROPERTY CASUALTY  
COMPANY, ET AL.

Plaintiffs,

vs.

FEDERATED MUTUAL INSURANCE  
COMPANY, a Minnesota corporation,

Defendant.

CASE NO.: 3:07-cv-03459-BZ

STIPULATION AND [PROPOSED]  
ORDER RE EXTENDING TIME TO  
MOVE THE COURT TO RESTORE THIS  
MATTER TO THE CALENDAR

**WHEREAS** the Court entered Conditional Order of Dismissal on April 24, 2008 dismissing the action with prejudice on the grounds that the parties have agreed to a settlement, provided that any party may, within 60 days of the date of the order, move the Court to restore this matter to the calendar on the grounds that the settlement has not been consummated;

**WHEREAS** pursuant to the parties' stipulation, the Court entered order on June 26, 2008 that the parties may, before August 22, 2008, move the Court to restore this matter to the calendar; and

**WHEREAS** the settlement agreement between the parties has been finalized and settlement payments are pending receipt of final defense invoices and issuance of indemnity payment in the underlying action;

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1 **IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES HERETO**, through  
2 their respective counsel, that the parties may, before October 22, 2008, move the Court to restore this  
3 matter to the calendar on the grounds that the settlement has not been consummated.

4  
5 DATED: August 8, 2008

MORALES FIERRO & REEVES

6 By: /s/ Ramiro Morales  
7 Ramiro Morales  
8 Attorneys for Plaintiffs  
9 TRAVELERS PROPERTY CAS. CO., ET AL.

10  
11 DATED: August 8, 2008

MEAGHER & GEER P.L.L.P.

12 By: /s/ Laura J. Hanson  
13 Laura J. Hanson  
14 Jenny L. Sautter  
15 Attorneys for Defendant  
16 FEDERATED MUTUAL INSURANCE COMPANY

17 **ATTESTATION RE CONFORMED SIGNATURE**

18 Pursuant to General Order No. 45, I hereby attest that concurrence in the filing of the  
19 document has been obtained from Ms. Laura J. Hanson on August 8, 2008 at 5:36 p.m., which shall  
20 serve in lieu of her signature on this document.

21  
22 DATED: August 8, 2008

MORALES FIERRO & REEVES

23 By: /s/ Ramiro Morales  
24 Ramiro Morales  
25 Attorneys for Plaintiffs  
26 TRAVELERS PROPERTY CAS. CO., ET AL.

27 **ORDER RE EXTENDING TIME TO MOVE THE COURT TO RESTORE THIS MATTER**  
28 **TO CALENDAR**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: August \_\_\_\_, 2008

\_\_\_\_\_  
Bernard Zimmerman  
United States Magistrate Judge

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1 *Travelers Property Casualty Company, et al. v. Federated Mutual Insurance Company*  
2 U.S. District Court, Northern District of California  
3 Case No. C-07-3459 BZ

4 **PROOF OF SERVICE**

5 STATE OF CALIFORNIA, COUNTY OF CONTRA COSTA

6 I am employed by the Law Offices of Morales, Fierro & Reeves located at 2300 Contra  
7 Costa Blvd., Suite 310, Pleasant Hill, CA 94523. I am over the age of eighteen years and not a party  
8 to the within action.

8 On August 8, 2008, I served the document(s) described as:

9 **STIPULATION AND [PROPOSED] ORDER RE EXTENDING TIME TO MOVE**  
10 **THE COURT TO RESTORE THIS MATTER TO THE CALENDAR**

11 on the interested party(ies) in this action as follows:

12 Federated Mutual Insurance Company  
13 c/o Laura J. Hanson, Esq.  
14 Jenny L. Sautter, Esq.  
15 Meagher & Geer P.L.L.P.  
16 33 South Sixth Street, 44<sup>th</sup> Floor  
17 Minneapolis, Minnesota 55402

18 Service was effectuated in the following manner:

19 ■ BY U.S. MAIL: By placing the document(s) listed above in a sealed envelope(s) addressed  
20 to the parties listed below or on the attached service list. I am readily familiar with the  
21 firm's practice of collection and processing correspondence for mailing. Under that practice  
22 it would be deposited with U.S. Postal Service on the same day with postage thereon fully  
23 prepaid at Pleasant Hill, California in the ordinary course of business. I am aware that on  
24 motion of the party served, service is presumed invalid if postal cancellation date or postage  
25 meter date is more than one day after date of deposit for mailing in affidavit.

26 I declare under penalty of perjury under the laws of the State of California that the  
27 above is true and correct.

28 Executed on August 8, 2008, at Pleasant Hill, California.

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